

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates.

I liken the situation to that of restaurants in a town. Suppose your town 40 years ago had only three restaurants. And now you have 89 restaurants. On the face of things, this could be seen as an improvement. But if the overwhelming majority of those 89 restaurants are outlets of fast-food chains owned by a small number of giant corporations, you wouldn't think that more numbers equals greater diversity.

The situation is eerily parallel with the our media landscape, particularly television. 40 years ago we had three TV channels. Now, according to Nielsen Media Research, the average TV viewer has 89 channels to choose from. On the face of things, that could be seen as an improvement. But the overwhelming majority of those channels are owned by a small number of giant corporations, which are commercially-driven operate according to maximizing profit.

That means more mind-numbing commercials since more commercials mean more profit. That means less hard-hitting investigative journalism since journalism is costly and risky to profit since it's offensive to powerful interests (like corporations: Enron, anyone?). That means more violence and killing on media since violence on media gets increased ratings and hence increased profits (and desensitizes us all too similar to the conditioning that police and military undergo).

And we can leave the realm of the abstract: we're seeing this already with (as one example) ClearChannel: a firm which owns some 1200 radio stations, and which is notorious for automated blandness across its channels. Sure, it's efficient in a narrow sense and profitable, but that doesn't lead to quality radio. Or radio that's responsive to local needs (if there's a tornado in your town, your radio station can't respond promptly if the owners are a corporation that's thousands of miles away).

But then there's the Internet, and yes there is a wide variety on the Internet, but it's foolish to think that the Internet will compensate for this corporate-driven uniformity. (1) Not everyone has access to the Internet. (2) 75% of all Internet traffic occurs on just three (corporate) websites. (3) It's hard to promote and finance websites which aren't part of the corporate media nexus.

And there's ample historical precedent for following a path of restricted media ownership. Take Germany and Japan after World War II: the U.S. government, in setting up the postwar governments in those countries, set up restrictions on media ownership because they (we) saw media concentration as conducive to antidemocratic politics.

For these reasons, I would ask the FCC not to repeal its media ownership restrictions.

Thank you.